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Sent: Wednesday, January 20, 2016 9:39 PM

To: Barefoot, Luke A.

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Subject: Re: Petrobras / Individual Actions

Dear Counsel,

Thank you for compiling this email list.

First, with respect to the discovery dispute, the Court quashes defendant's document request regarding transaction data in non-Petrobras issuers. The defendant may inquire into this topic at 30(b)(6) depositions, and defendant may renew its request if the depositions provide a proper basis to do so.

Second, with respect to scheduling motions practice on the Morrison issue, the Court sets the following schedule:

By **January 29**, any plaintiff (regardless of whether a response to their pleading has been filed) may amend their pleadings with respect to the Morrison issue.

By **February 12**, defendants will file moving papers.

By **February 26**, plaintiffs will file opposition papers.

By **March 4**, defendants will file reply papers.

Oral argument will be held on **Friday, March 11 at 2:00 pm.**

Best,
 Steven Kochevar
 Clerk to the Hon. Jed S. Rakoff
 U.S. District Court for the Southern District of New York
 Daniel Patrick Moynihan United States Courthouse
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 New York, NY 10007
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 Date: 01/20/2016 06:52 PM
 Subject: Petrobras / Individual Actions

Mr. Kochevar,

Thank you again for your time this evening. As discussed, we have copied on this email what we believe should be an over-inclusive list of defendants in the individual actions proceeding as part of the consolidated securities litigation, including those who were on the call this evening.

Respectfully submitted,

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